

**From:** Bray, Dave [Bray.Dave@epa.gov]  
**Sent:** 3/2/2018 11:17:27 PM  
**To:** Narvaez, Madonna [Narvaez.Madonna@epa.gov]  
**Subject:** FW: OOOOa Alaska North Slope Specific Concerns

## Ex. 5 Deliberative Process (DP)

Dave

---

**From:** Pavitt, John  
**Sent:** Thursday, October 13, 2016 4:29 PM  
**To:** Bray, Dave <Bray.Dave@epa.gov>  
**Cc:** Dossett, Donald <Dossett.Donald@epa.gov>; Soderlund, Dianne <Soderlund.Dianne@epa.gov>; Shaw, Hanh <Shaw.Hanh@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>  
**Subject:** RE: OOOOa Alaska North Slope Specific Concerns

I think it's a good idea to have an internal discussion, and probably bring in OAQPS.

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

John Pavitt  
US EPA Region 10, Alaska Operations Office  
(907) 271-3688

---

**From:** Bray, Dave  
**Sent:** Thursday, October 13, 2016 2:40 PM  
**To:** Pavitt, John <Pavitt.John@epa.gov>  
**Cc:** Dossett, Donald <Dossett.Donald@epa.gov>; Soderlund, Dianne <Soderlund.Dianne@epa.gov>; Shaw, Hanh <Shaw.Hanh@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>  
**Subject:** RE: OOOOa Alaska North Slope Specific Concerns

Thanks John.

I wonder if we should have an internal discussion before we talk further with BP and CPAI? It sounds like you and OAQPS are a bit ahead of Don and I with respect to the issues that the companies are raising (maybe Madonna knows more).

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Your thoughts?

Dave

---

**From:** Pavitt, John

**Sent:** Thursday, October 13, 2016 2:36 PM

**To:** Perry, Laura K <Laura.Perry@conocophillips.com>; Dossett, Donald <Dossett.Donald@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>; Buckbee, Rachel B (BP) <Rachel.Kain@bp.com>; Soderlund, Dianne <Soderlund.Dianne@epa.gov>; Shaw, Hanh <Shaw.Hanh@epa.gov>

**Subject:** RE: OOOOa Alaska North Slope Specific Concerns

I can attend.

Laura and Rachel, thank you for the meeting you had with me earlier this week, in which I learned about your concerns with subpart OOOOa. I am happy to participate in further discussions with EPA R10.

John Pavitt

US EPA Region 10, Alaska Operations Office  
(907) 271-3688

-----Original Appointment-----

**From:** Perry, Laura K [mailto:Laura.Perry@conocophillips.com]

**Sent:** Thursday, October 13, 2016 1:21 PM

**To:** Dossett, Donald; Bray, Dave; Buckbee, Rachel B (BP); Pavitt, John; Soderlund, Dianne; Shaw, Hanh

**Subject:** OOOOa Alaska North Slope Specific Concerns

**When:** Tuesday, October 18, 2016 9:30 AM-11:00 AM (UTC-09:00) Alaska.

**Where:** Conference Call: 1.866.641.1232 Code: 938.209.2242

Hi Don and Dave,

As discussed over the phone, here is the meeting I promised. I will try to hold the meeting to 1 hour, but I added the extra 30 minutes in the event it runs long.

Rachel Buckbee (BP) and I met with OAQPS in August of this year to voice our remaining concerns on the final OOOOa rule to try to work out a path forward for Alaska North Slope compliance. During this meeting we were strongly encouraged to discuss our issues with you (Region 10). I have attached the presentation that we gave to OAQPS to this invite for your reference. Also for your reference, here is a brief list of the issues with rule citations:

- Fugitive Emissions (well sites) 60 day initial survey (60.5397a(f)(1)) – Cold weather technological limitations of OGI
- Fugitive Emissions Repair Timelines (60.5397a(h)(1) and (2)) – Parts unavailability and emergency/unplanned shutdowns
- Fugitive Emissions Wellsite/Compressor Station Definitions (60.5430a) – Co-location of Production facility with a drill site (picture attached)
- Process Units (60.5401a(e)) - North Slope Exemption unclear

Dianne and Hanh, I was asked to include you on this invite by my management in response to the North Slope visit a couple months ago.

John, I've included you on the invite as an inform, as we will be reviewing the exact same information in this meeting as the meeting Rachel and I had with you on 10/11.

Please invite anyone else to this meeting that you think would like to attend. If there is a better time that works for everyone, please let me know and Rachel Buckbee and I will make it work.

Thank you for this opportunity to talk about the new regulation.

Regards,  
Laura Kay Perry

*Coordinator – Air Quality*  
*Direct: 907-265-6937*  
*Cell: 907-854-8356*

<< File: 20160831 OOOOa Fugitive Emissions EPA.PDF >> << File: CD1.pdf >>